

SULLIVAN & CROMWELL LLP

TELEPHONE: 1-212-558-4000
FACSIMILE: 1-212-558-3588
WWW.SULLCROM.COM

125 Broad Street
New York, NY 10004-2498

LOS ANGELES • PALO ALTO • WASHINGTON, D.C.

FRANKFURT • LONDON • PARIS

BEIJING • HONG KONG • TOKYO

MELBOURNE • SYDNEY

March 15, 2015

Via ECF

Hon. Denise L. Cote,
United States District Judge,
500 Pearl Street, Room 1610,
New York, NY 10007-1312.

Re: FHFA v. Nomura Holding America, Inc., No. 11-cv-6201
(S.D.N.Y.)

Dear Judge Cote:

I write on behalf of the Nomura and RBS defendants regarding proposed redactions to the four letters that defendants intend to file today. Approximately 21 exhibits to these letters have been designated by plaintiff as “Confidential” or “Highly Confidential” under the First Amended Protective Order, dated January 11, 2013, and defendants are therefore filing these materials under seal, pursuant to Paragraph 9 of that Order.

In order to give plaintiff the opportunity to review the documents, defendants respectfully request that the parties be given (a) until March 27, 2015 to meet and confer regarding proposed redactions, and (b) until April 3, 2015 to file a joint submission listing the agreed-upon redactions, as well as any redactions to which a party objects. Plaintiff consents to this proposed schedule.

Respectfully submitted,

/s/ David B. Tulchin

David B. Tulchin